

Application for FCC Section 214 License

Before the

Federal Communications Commission

Washington, D.C. 20554

In the Matter of)	
)	
Systems Resource Group Limited,)	
Application Under Section 214)	File No. TC_____
Of the Communication Act of 1934,)	
)	
As Amended, for Global Authority)	
)	
For the Provision of Resold)	
and Facilities-Based)	
)	
International Switched and)	
Private Line Services)	
)	
Between the U.S. and Various)	
International Points)	

APPLICATION

Systems Resource Group Limited ("SRGL" or "Applicant"), pursuant to Section 214 of the Communications Act of 1934, as amended ("the Act"), 47 U.S.C. 214, hereby requests global authority to (1) operate as a facilities-based carrier pursuant to the terms and conditions of Section 63.18 (e)(1) of the Commission's Rules, 47 C.F.R. 63.18 (e)(1), to all foreign points as authorized by the Commission and (2) operate as a resale carrier pursuant to the terms and conditions of Section 63.18 (e)(2) of the Commission's Rules to all foreign points as authorized by the Commission. 47 C.F.R. 63.18 (e)(2).

SRGL holds a telecommunications license (dated October 23rd, 2002) issued by the Commonwealth of the Bahamas' Public Utilities Commission to operate domestic and international voice telecommunications services within, into, from or through the Bahamas, effective January 1st, 2004. Commercial data communications of all types

(except paging and mobile radio) are allowed immediately. SRGL is the first such licensed voice carrier in the Bahamas to compete with the incumbent “dominant carrier”, Bahamas Telecommunications Company (“BTC” formerly “Batelco”). SRGL is not affiliated with any dominant U.S. (or other foreign) carrier whose services SRGL may resell. SRGL currently has a zero market share in the Bahamas, as the network infrastructure is under construction through 2003. SRGL expects that new domestic and long-distance competition will foster a reduction in per minute long-distance costs to and from the Islands of the Bahamas.

Though SRGL is very clearly “non-dominant” in the Bahamas, as a foreign carrier in a destination market (Bahamas) SRGL does not appear to qualify for streamlined application processing under Section 63.12 of the Commission's Rules. 47 C.F.R. 63.12.

According to the FCC's fee schedule, Fee Code CUT, a credit card payment in the amount of \$815.00USD has been processed.

In support of its request for authority, SRGL submits the following information pursuant to Section 63.18 of the Commission's Rules, 47 C.F.R. 63.18.

- (a) The name, address and telephone number of the Applicant is:

Systems Resource Group Limited,
Centreville House, Collins Ave.,
Nassau, Bahamas
P.O. Box N-3920
(242) 325-0011

- (b) Systems Resource Group Limited (SRGL) is a corporation organized under the laws of the Commonwealth of the Bahamas.

- (c) Correspondence concerning this Application should be addressed to:

Mark Livingstone
Chief Technology Officer,
Systems Resource Group Limited,
Centreville House, Collins Ave.,
Nassau, Bahamas
P.O. Box N-3920
(242) 325-0011
mlivingstone@srg.com.bs

- (d) SRGL has not previously applied for or received Section 214 authority from the Commission.

- (e) SRGL is applying for authority to operate as a facilities-based carrier pursuant to the terms and conditions of Section 63.18 (e)(1), of the Commission's Rules 47

- C.F.R. 63.18 (e)(1) and as a resale carrier pursuant to the terms and conditions of Section 63.18 (e)(2) of the Commission's Rules. 47 C.F.R. 63.18 (e)(2). SRGL requests authority to serve all countries permitted under a grant of global authority. As evidenced by the certification appended, SRGL will comply with the terms and conditions contained in Section 63.21, 63.22 and 63.23 of the Commission's Rules. 47 C.F.R. 63.21-.23.
- (f) At this time, Applicant does not seek authority to provide service not referenced under paragraph (e) of Section 63.18 of the Commission's Rules. 47 C.F.R. 63.18(e).
- (g) SRGL will use previously authorized facilities to provide the services requested by the Application. Consequently, SRGL is categorically excluded from environmental assessment pursuant to Section 1.1306 of the Commission's Rules. 47 C.F.R. 1.1306.
- (h) SRGL's principal shareholders are as follows:
- Island Corporate Holdings (49%), a widely diversified holding company operating in the Caribbean region. The principal shareholder of Island Corporate Holdings is Mr. Frank Crothers, vice-chairman of SRGL.
 - Tribune On-Line Limited (12%), a subsidiary of Tribune Radio Holdings Limited (TRHL), which operates the Tribune newspaper in the Bahamas. The principal (60%) shareholder of TRHL is Mrs. Eileen Carron, editor of the Tribune Newspaper.
 - Dr. David Allen (10%), Chairman of SRGL
 - Mr. Paul Hutton-Ashkenny (10%), President and CEO of SRGL
- No entity or individual other than the above mentioned has 10 percent or more ownership interest in SRGL.
- (i) SRGL is a foreign carrier operating in the Commonwealth of the Bahamas. SRGL is not affiliated with any other carrier.
- (j) SRGL seeks to provide international telecommunications service to all destinations, including the Commonwealth of the Bahamas, where it is a licensed carrier.
- (k) Under Section 63.18(k)(2) of the Commission's rules, 47 C.F.R. § 63.18(k)(2), SRGL wishes to demonstrate that it lacks market power and cannot adversely affect competition in the U.S. market:
- 1) SRGL is a newly-licensed (October 23rd, 2002) operator in the Commonwealth of the Bahamas.
 - 2) SRGL currently has no telephony or international data subscribers.
 - 3) SRGL is not eligible, under the conditions of its Bahamian telecommunications license, to offer telephony services in competition

with the previously defined (reference FCC DA 99-809 released June 18, 1999) incumbent “dominant carrier” (Batelco/BTC) until January 1st, 2004.

- (l) SRGL certifies that it will file the quarterly traffic reports required by Section 43.61(c) of the Commission’s rules. 47 C.F.R. §§ 43.61(c).
- (m) Under Section 63.18(m) of the Commission’s rules, 47 C.F.R. § 63.18(m), SRGL wishes to demonstrate that it is a “non-dominant carrier” in the Commonwealth of the Bahamas:
 - 1) SRGL is a newly-licensed (October 23rd, 2002) operator in the Commonwealth of the Bahamas and does not yet offer telecommunications services.
 - 2) SRGL currently has no domestic or international telephony or international data subscribers, and accordingly, has no market share.
 - 3) SRGL is not eligible, under the conditions of its Bahamian telecommunications license, to offer telephony services in competition with the previously defined (reference FCC DA 99-809 released June 18, 1999) incumbent “dominant carrier” (Batelco/BTC) until January 1st, 2004.
- (n) SRGL certifies it will not accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route over which the foreign carrier possesses sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market. SRGL agrees not to enter into any such agreements now or in the future.
- (o) As evidenced by this certification, no party to this application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.
- (p) Under section 63.12 of the Commission’s rules. 47 C.F.R. §§ 63.12, SRGL does not believe it qualifies for stream-lined processing.

Wherefore, SRGL respectfully requests that the Commission grant it authority to provide international telecommunications services on a facilities and resale basis pursuant to Section 214 of the Communications Act of 1934, as amended.

Respectfully submitted,

Systems Resource Group Limited.

By: _____
Mark Livingstone, Chief Technology Officer
Systems Resource Group Limited,
Centreville House, Collins Avenue,
Nassau, Bahamas

(242) 325-0011

Date: _____